

1 William J. Flynn, State Bar No. 95371
2 Scott M. De Nardo, State Bar No. 216749
NEYHART, ANDERSON, FLYNN & GROSBOLL
2 44 Montgomery Street, Suite 2080
3 San Francisco, CA 94104
4 Tel. (415) 677-9440
Fax (415) 677-9445
Email: sdenardo@neyhartlaw.com

5

6 UNITED STATES DISTRICT COURT
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA
8 (San Francisco Division)

9

10 LOCAL 234 of the INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO; et al.,

11

Plaintiffs,

12

vs.

13

ADM ELECTRIC, INC., a California
Corporation; and, G. DEAN ALLEMAND, an
Individual,

14

Defendants.

15

16

17 TO: THE CLERK OF THE ABOVE-ENTITLED COURT

18 Plaintiffs LOCAL 234 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL
19 WORKERS, AFL-CIO; INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS'
20 UNION, LOCAL 234 EDUCATIONAL AND TRAINING FUND; ELECTRICAL WORKERS
21 HEALTH & WELFARE TRUST FUND; INTERNATIONAL BROTHERHOOD OF
22 ELECTRICAL WORKERS DISTRICT 9 PENSION PLAN; and, KEN SCHERPINSKI, as
23 Trustee of the Plaintiff Trusts and Business Manager/Financial Secretary of I.B.E.W. Local 234,
24 hereby request that the Clerk of the above-entitled Court enter default in this matter against

25

26

27

28

Case No. C-07-4079 EMC

**REQUEST TO ENTER DEFAULT
AGAINST DEFENDANTS ADM
ELECTRIC, INC. and G. DEAN
ALLEMAND**

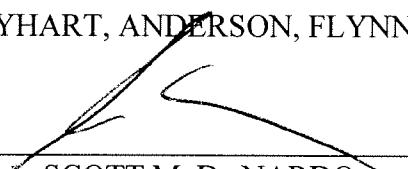
[F.R.C.P. Rule 55(a)]

1 Defendant ADM ELECTRIC, INC., a California Corporation and Defendant G. DEAN
2 ALLEMAND, on the ground that said Defendants have failed to appear or otherwise respond to
3 the Summons and Complaint within the time prescribed by the Federal Rules of Civil Procedure.

4 Plaintiffs served the Summons and Complaint on Defendant ADM ELECTRIC, INC. on
5 September 1, 2007 as evidenced by the Proofs of Service of Summons and Complaint filed with
6 this Court. Plaintiffs also served the Summons and Complaint on Defendant G. DEAN
7 ALLEMAND on September 1, 2007 as evidenced by the Proofs of Service of Summons and
8 Complaint filed with this Court.

9
10 The above-stated facts are set forth in the accompanying Declaration of Scott M. De Nardo,
11 filed herewith.
12

13 Respectfully Submitted,

14 Dated: 9/22/07 NEYHART, ANDERSON, FLYNN & GROSBOLL
15
16 By: 
17 SCOTT M. De NARDO
18 Attorneys for Plaintiffs
19
20
21
22
23
24
25
26
27

PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On September 23, 2007, I served the within:

REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS ADM ELECTRIC, INC. and G. DEAN ALLEMAND

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

ADM ELECTRIC, INC.
2120 Santa Rosa Drive
Hollister, CA 95023

G. DEAN ALLEMAND
2120 Santa Rosa Drive
Hollister, CA 95023

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on September 20, 2007, at San Francisco, California.

Scott M. De Nardo